

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Provision of Directory Listing Information)	CC Docket No. 99-273
Under the Communications Act of 1934,)	
As Amended)	
)	
The Use of N11 Codes and Other Abbreviated)	CC Docket No. 92-105
Dialing Arrangements)	
)	
Administration of the North American)	CC Docket No. 92-237
Numbering Plan)	

COMMENTS OF NEUSTAR, INC.

NeuStar, Inc, submits the following comments in response to the Federal Communications Commission's (Commission) Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.¹ In the NPRM, the Commission seeks comment on several proposed methods of promoting competition and choice in the retail directory assistance (DA) market. The methods proposed by the Commission are grouped into two main categories for leveling the DA playing field: 1) eliminating 411 and allowing DA providers to compete via an alternative numbering scheme, or 2) maintaining the easily recognizable 411 and implementing a means by which consumers can select their preferred DA provider.

¹ *In the Matter of Provision of Directory Listing Information Under the Communications Act of 1934, as Amended* (CC Docket No. 99-273), *The Use of N11 Codes and Other Abbreviated Dialing Arrangements* (CC Docket No. 92-105), *Administration of the North American Numbering Plan* (CC Docket No. 92-237), FCC 01-384 (rel. Jan. 9, 2002) (NPRM).

Should the Commission decide that maintaining the 411 numbering scheme would be in the best interest of consumers and the industry, NeuStar would be interested in competing to provide neutral third party (NTP) development, administration and operation of a master consumer DA presubscription database housing the DA provider of choice for each telephone number able to access 411. As a neutral third party administrator of critical infrastructure numbering services such as the North American Numbering Plan, national number pooling, and the Number Portability Administration Center (NPAC), NeuStar has a unique understanding of the requirements necessary to implement and maintain a neutral and fair-handed DA presubscription database equally accessible by all service providers. In addition to competing for the development and operation of a DA presubscription database, NeuStar also is prepared to compete to provide initial pre-selection services. In the interest of efficiency and cost containment, NeuStar believes that a solution consisting of balloting via a combination of mail, e-mail, voice response unit (VRU), phone, and web site, used in combination with a clearly defined default policy, would be well suited to this type of pre-selection.

I. A Carrier-To-Carrier Service Center is the Most Cost-Effective Approach for Development and Operation of DA Presubscription Database

The following briefly describes NeuStar's preferred approach, in which a NTP, functioning as a Carrier-to-Carrier (C2C) Service Center, would be designed and operated to administer and maintain the proper correlation between customers and their presubscribed DA providers. NeuStar believes that the C2C Service Center concept will prove to be the most cost-effective approach for a 411 presubscription environment. Additionally, NeuStar believes that the C2C Service Center described herein is a technically sound method of

processing and tracking presubscribed data as well as a solution that will introduce operational efficiencies and other cost saving advantages to the industry.

The C2C Service Center approach provides a common, centralized and neutral administrator to process and track DA presubscription selection data and any subsequent DA selection changes. In addition, the C2C Service Center would also communicate consumers' DA selection to the chosen DA provider. In the event that consumers make changes to their presubscribed DA provider, the C2C Service Center would communicate this change to both the new and old DA providers.

The C2C Service Center functions as a clearinghouse, which is a one-to-many business model. A clearinghouse business approach operates as a hub and obviates the need for a DA provider to directly exchange presubscription information with competing DA providers. The clearinghouse model greatly reduces potential delays and operational problems encountered in a many-to-many approach.

In addition, the C2C approach eliminates or alleviates a number of related problems, such as:

- Absence of fully functional, interactive OSS systems in many new LSPs' back offices;
- Multiple presubscription record formats and processing standards that create an unmanageable and cost-prohibitive process for some DA providers;
- Reduces the opportunity for either intentional or unintentional DA presubscription changes due to slamming and the ability to identify the responsible party (a concern that was raised in the NPRM).

The C2C Service Center, in effect, replicates many similar services implemented in the mid-1980s to administer the primary interexchange carrier (PIC) equal access presubscription process for long distance service. The C2C Service Center would function in

a neutral and evenhanded manner to administer the DA presubscription process. At a high level, the C2C Service Center would perform the following functions:

- Receive DA presubscription records either from the participating carriers providing DA, directly from a DA provider, or potentially the telephone subscribers themselves. Standardization of the information submitted by all parties can be facilitated through an existing industry forum, such as the Alliance for Telecommunications Services (ATIS);
- Provide access to the C2C Service Center for the mechanized transfer of DA presubscription records through diverse network and electronic interfaces;
- Accept DA presubscription changes by fax, internet, email or telephone call;
- Maintain accurate and detailed records that track the processes and procedures employed by the C2C Service Center; and
- Ensure access security and confidentiality of all DA presubscription records and customer information.

It also should be noted that the C2C Service Center could maintain a type of DA-freeze database to ensure that consumers are not inadvertently or intentionally moved to another DA provider without the consumer's permission.

II. The C2C Service Center's Centralized Architecture Allows for Ease of Access and Economical Administration

From an architecture perspective, the system itself would be housed in a centralized data center. DA providers would be connected to the C2C Service Center's central facility through dedicated and/or dial-up access lines or through a web graphical user interface (GUI). Carriers and DA providers already have access by similar means to various industry-developed centralized line number portability databases and easily will be able to connect with the C2C system. The C2C Service Center's centralized architecture would result in savings for all DA providers and would mitigate the need for DA providers to establish telecommunication links with each other.

Although the C2C Service Center will house a large number of DA records, the data storage and retrieval needs of such a centralized system are quite manageable and commonplace in both telecommunications (e.g., National Directory Assistance) and other industries (e.g., Credit Card). The DA record would consist primarily of the customer's name, telephone number, DA provider, freeze status, if applicable, and type of customer (business or residence). The DA customer record also could allow for the inclusion of a unique identifier that could be used to verify the authenticity of a DA change order. Another access option that the C2C Service Center could support would be a standard programmable VRU method, which would provide consumers access to their DA records using telephone tree logic and information. The VRU option would allow consumers to place or change their DA selection either directly with a DA provider or through the C2C Service Center's VRU.

NeuStar's proposed C2C Service Center for managing DA presubscription embraces the same qualities of the clearinghouse service paradigm, which has been a standard fixture in the industry for many years. Clearinghouse-type service bureaus are utilized by many carriers for various back office functions because they have been found to be an economical and time saving alternative for carriers and a more expeditious provisioning tool for their customers.

III. CONCLUSION

NeuStar would welcome the opportunity both to participate in the discussion of requirements for a Directory Assistance provider pre-selection service, as well as to compete for its development, operation and administration.

Respectfully submitted,

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